



The WALT Disney Company

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

January 16, 2001

**By Hand**

Ms. Magalie Roman-Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

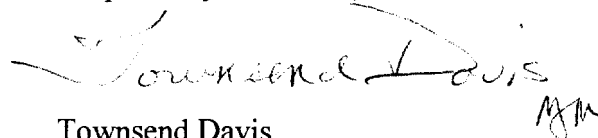
Re: OMD Docket No. 00-205  
In the Matter of Adoption of a Mandatory FCC Registration Number

Dear Ms. Salas:

We are transmitting herewith for filing with the Commission an original and four copies of Comments of The Walt Disney Company and its subsidiary, ABC, Inc., in OMD Docket No. 00-205.

If there are any questions in connection with the foregoing, please contact the undersigned.

Respectfully submitted,

  
Townsend Davis

bcc: Alan Braverman  
Preston Padden  
Lou Meisinger  
Sam Antar  
Marsha MacBride

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OFFICE OF THE SECRETARY**

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of

Adoption of a Mandatory  
FCC Registration Number

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OMD Docket No. 00-205

COMMENTS OF THE WALT DISNEY COMPANY

Sam Antar, Vice President  
Townsend Davis, Senior Counsel

ABC, Inc.  
77 West 66th Street  
New York, New York 10023

January 16, 2001

Before the  
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Washington, D.C. 20554

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In the Matter of )  
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Adoption of a Mandatory ) OMD Docket No. 00-205  
FCC Registration Number )  
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To: The Commission

COMMENTS OF THE WALT DISNEY COMPANY

The Walt Disney Company ("TWDC"), on behalf of itself and its subsidiary ABC, Inc. ("ABC"), submits these comments in response to the Commission's request for comment on adoption of a mandatory 10-digit FCC registration number ("FRN").<sup>1</sup>

Introduction

ABC regularly submits filings with the Commission arising out of ABC's ownership of 10 television and 51 radio stations, as well as the hundreds of broadcast auxiliary and other licensed facilities associated with the operation of those stations and the ABC Radio and Television Networks. ABC is a regular user of several of the Commission's licensing and payment systems, both manual and electronic. Thus far, ABC has been assigned 20 FRNs by the Commission's Universal Licensing System (ULS). ABC used one of these numbers to complete an electronic filing of Annual Regulatory Fees in 2000.

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<sup>1</sup> OMD Docket No. 00-205, Report No. FCC 00-421, released December 15, 2000 ("Proposed Rules").

### Argument

ABC does not oppose the idea of requiring entities doing business with the Commission to obtain a unique identification number (the FRN) through the Commission Registration System (CORES). Proposed Rules ¶ 1. The goal of using an FRN to improve efficiency is laudable. Id. However, we believe it is premature to require licensees to use an assigned FRN for all filings requiring payment of a fee (Proposed Rules ¶ 18) because of certain practical problems presented by existing payment systems. In addition, we believe that requiring each applicant to use the revised Form 159 to submit payment is also premature because of problems we have experienced with that form. Unless these problems are remedied, amending the Commission's rules to require mandatory use of an FRN will not achieve the desired efficiencies.

ABC has experienced two particular problems that we believe should be addressed before the use of FRNs is made mandatory.

#### 1. Multiple Licensees Owned by the Same Parent Company

Each of ABC's subsidiaries has a unique Tax Identification Number, and as a result each subsidiary that holds one or more licenses has (or will have) an FRN for filings with the Commission. Our experience with the Annual Regulatory Fee payment system indicates that when the parent company makes a joint filing that includes regulatory fees for more than one subsidiary, only the FRN of the parent company is associated with the payment, and the FRNs of the individual licensees/subsidiaries appear to be unused by the system. If the licensee/subsidiary is ultimately responsible for payments covering its licenses, we believe the licensee/subsidiary should be credited for

payments made on its behalf so that it does not appear incorrectly to be in arrears.

Although the Commission anticipates that subsidiaries of, or counsel for, an entity will each have unique FRNs (Proposed Rules ¶¶ 14-15, 20)—and ABC supports this approach—the Commission's filing systems should be able to properly credit payments made on behalf of a licensee that is a subsidiary of another entity, regardless of the source of payment.

## 2. Mandatory Use of the Revised Form 159

ABC has found the revised Form 159, which includes the FRN (Proposed Rules ¶ 18), is cumbersome to use for three specific reasons.

First, the Commission's electronic filing systems still use the previous version of the Form 159. After filing an electronic form using some of the Commission's electronic filing systems, such as those used by the Wireless Bureau (ULS), the International Bureau (IBFS), and the Mass Media Bureau (call sign reservation system), the applicant is next prompted by the system to complete and print out a Form 159 to accompany a payment instrument. Portions of the form are automatically completed to match those in the application just submitted, including the file number. This is extremely useful to prevent typographical errors and misdirected payments. It is important that these error-reducing systems be converted to use the revised Form 159.

Second, some FCC systems, such as the Mass Media Bureau CDBS and those not yet accepting electronic filings, require a Form 159 to be completed manually. The previous Form 159 was made available in a computer format that was capable of being filled out on a computer and conveniently printed using Acrobat Reader. This allows the

form to be quickly completed, printed, proofread, corrected and reprinted before it is submitted with the payment instrument. The revised Form 159, however, is not currently available in this computer-friendly format.

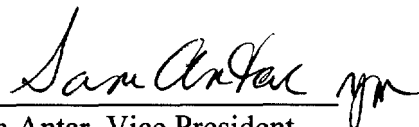
Third, the revised Form 159 is not even typewriter-friendly, as it is printed with individual boxes intended for individual characters. Typing such a form is difficult to do cleanly, and the alternative of completing a handwritten version is time consuming, burdensome to FCC staff, and prone to errors of interpretation.

For the foregoing reasons, ABC has continued to use the previous version of the Form 159 to minimize errors and increase efficiency. ABC urges that the problems we have identified be addressed before the Commission makes use of the revised Form 159 mandatory.

#### Conclusion

For the reasons set forth above, TWDC respectfully submits that the Commission should not adopt the Proposed Rules until the problems with existing payments systems are resolved.

Respectfully submitted,

By:   
Sam Antar, Vice President  
Townsend Davis, Senior Counsel  
Law & Regulation  
ABC, Inc.  
77 West 66 Street  
New York, NY 10023-6298